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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
DIVISION

Beverly Ann Jackson  
McDonald

Plaintiff(s),

v. Miers Goodwill  
Industries

Case No. \_\_\_\_\_  
(to be assigned by Clerk of District Court)

JURY TRIAL DEMANDED

YES ☐ NO ☐

Defendant(s). (Enter above the full name(s)  
of all defendants in this lawsuit. Please  
attach additional sheets if necessary.)

EMPLOYMENT DISCRIMINATION COMPLAINT

1. This employment discrimination lawsuit is based on (check only those that apply):

☒ Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et seq.*, for employment discrimination on the basis of race, color, religion, gender, or national origin.  
*NOTE: In order to bring suit in federal district court under Title VII, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission.*

☒ Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, *et seq.*, for employment discrimination on the basis of age (age 40 or older).  
*NOTE: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the Equal Employment Opportunity Commission.*

☐ Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et seq.*, for employment discrimination on the basis of disability.  
*NOTE: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission.*

Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, *et seq.*, for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance.

NOTE: In order to bring suit in federal district court under the Rehabilitation Act of 1973, you must first file charges with the appropriate Equal Employment Office representative or agency.

✓ Other (Describe) employment interference  
every time I get employed sense  
2006 they fire me for not being apart  
of the team sex team - they also interfere  
in my income

PARTIES

2. Plaintiff's name: Beverly Ann Jackson (McDonald)

Plaintiff's address: 2200 Henrietta St. 208  
Street address or P.O. Box

St. Louis Mo. 63104  
City/County/State/Zip Code

314-465-3472  
Area code and telephone number

3. Defendant's name: Mess Goodwill Industries

Defendant's address: 10125 Watson Rd  
Street address or P.O. Box

St. Louis Mo. 63127  
City/County/State/Zip Code

314-965-0090  
Area code and telephone number

314-241-3464

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES, ADDRESSES AND TELEPHONE NUMBERS ON A SEPARATE SHEET OF PAPER.

4. If you are claiming that the discriminatory conduct occurred at a different location, please provide the following information:

10125 Watson Rd Sunset Hills Mo 63127  
(Street Address) (City/County) (State) (Zip Code)

5. When did the discrimination occur? Please give the date or time period:

Around November 6 2019 and 11-18-2019

ADMINISTRATIVE PROCEDURES

6. Did you file a charge of discrimination against the defendant(s) with the Missouri Commission on Human Rights?

☒ Yes

Date filed:

10-29-19

☐ No

9-26-19

8-24-19

*I filed with other charges*

*it in there office*

*cant locate the letter*

*been more than 60 days*

*(located)*

*dates*

7. Did you file a charge of discrimination against the defendant(s) with the Equal

Employment Opportunity Commission or other federal agency?

☒ Yes

Date filed: 3-16-2020

☐ No

8. Have you received a Notice of Right-to-Sue Letter?

☒ Yes

☐ No

If yes, please attach a copy of the letter to this complaint.

9. If you are claiming age discrimination, check one of the following:

☒ 60 days or more have passed since I filed my charge of age discrimination with the

Equal Employment Opportunity Commission.

☐ fewer than 60 days have passed since I filed my charge of age discrimination with the

Equal Employment Opportunity Commission.

NATURE OF THE CASE

10. The conduct complained of in this lawsuit involves (check only those that apply):

☒ failure to hire me

☒ termination of my employment

☒ failure to promote me

☐ failure to accommodate my disability

☒ terms and conditions of my employment differ from those of similar employees

☒ retaliation

☒ harassment

☐ other conduct (specify):

After they fired me - they interfere with my income - I get being at home - and they follow me from company to company - Retaliation for file complaint against them - Religion is something they do not have

Did you complain about this same conduct in your charge of discrimination?

☒ Yes

☐ No

11. I believe that I was discriminated against because of my (check all that apply):

☒ race

☒ religion

☐ national origin

☒ color

☒ gender

☐ disability

☒ age (birth year is: 1960)

☒ other:

I keep myself A person that  
take care theyselve well - my Religion

Did you state the same reason(s) in your charge of discrimination?

☒ Yes

☐ No

12. State here, as briefly and clearly as possible, the essential facts of your claim. Describe specifically the conduct that you believe is discriminatory and describe how each defendant is involved in the conduct. Take time to organize your statement; you may use numbered paragraphs if you find it helpful. It is not necessary to make legal arguments, or to cite cases or statutes.

first of all they call they selfs - Teams  
Sex partners - Team exquisite - Orgys  
pretend the you are A manager,  
supervisor, Trainer - by having oral  
Sex - playing with each other souls  
When turn them down - they get

(Continue to page 6, if additional space is needed.)

together And Fire You -

that Against My Religion And  
my Rights to work (without all  
of that Harassment.)

my rights is being infringed on  
when I'm been subtle approach  
And that what - ~~what~~ they did at  
goodwill industries. Against my job  
I was let go because I would  
not go along with orgys to keep  
my jobs.

They go both ways sexually stated  
by them.  
She illegally Called Police on me - I  
called A lawyer right at that time  
before left - I do not have to give  
up my moral and values to work.

(Attach additional sheets as necessary).

13. The acts set forth in paragraph 12 of this complaint:

☒ are still being committed by the defendant.

☐ are no longer being committed by the defendant.

☒ may still be being committed by the defendant.

REQUEST FOR RELIEF

State briefly and exactly what you want the Court to do for you. Make no legal arguments;

cite no cases or statutes.

I want my Religious Right in peace - I want  
my employment rights in peace - I want to  
be financially compensated  
And not even be bother about it ever  
Again. I lost years of income from it.

14. Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule

X Beverly Ann Jackson (McDonald)



I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 13 day of September, 20 20.

Signature of Plaintiff Beverly Ann Jackson